

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC, ATLANTIC
RECORDING CORPORATION, CAPITOL
RECORDS, LLC, ELEKTRA ENTERTAINMENT
GROUP INC., LAFACE RECORDS LLC, SONY
MUSIC ENTERTAINMENT, UMG
RECORDINGS, INC., WARNER BROS.
RECORDS INC., WARNER MUSIC GROUP
CORP., and ZOMBA RECORDING LLC,

Plaintiffs,

v.

VITA TKACH, and DOES 1-10, D/B/A
GROOVESHARK.IO AND GROOVESHARK.PW

Defendants.

CIVIL ACTION
NO. 15-CV-03701-AJN

**Declaration of Justin Paine in Support of Non-Party CloudFlare, Inc.'s
Opposition to Plaintiff's Application for Supplemental Order**

I, Justin Paine, declare and state as follows:

1. My name is Justin Paine. I have worked at CloudFlare for nearly four years. I am currently the Head of Trust & Safety at CloudFlare. The Trust & Safety team is responsible for all inbound abuse reports regarding CloudFlare users.

Background on CloudFlare Sign-up and Abuse Handling

2. CloudFlare offers three retail, self-service plans: Free, Pro, and Business.
3. When a retail customer chooses to sign up for CloudFlare service, the customer follows the signup flow on our website. The signup process is entirely automated. Under normal circumstances, the signup process does not involve any interaction with any individual at CloudFlare in order to approve a signup. Roughly 5,000 websites sign up for CloudFlare each day. As such, it would not be feasible to manually review each and every website that signs up for service.

4. Since CloudFlare does not provide web hosting services to its customers, customers must be operating their own web servers or purchase hosting services from another provider before completing the signup.
5. CloudFlare does not provide anonymity services to its customers. Rather, CloudFlare will disclose customer private information upon receipt of valid and binding legal process issued by a court of competent jurisdiction.
6. CloudFlare can block a future sign-up based on three specific factors: a complete email address, a full IP address, or a complete domain name. CloudFlare's system is not designed to handle the blocking of a signup based on a partial component of any one of these factors.

Account Information with Regard to Certain "Grooveshark" Websites


7. In May 2015, four separate "Grooveshark" websites signed up for service, creating three unique accounts. The timeline for the registration of the websites and accounts was as follows:

Date	Event	Notes
2015-05-02	grooveshark.pw , grooveshark.io signed up for a Free service plan	Email address 1 used to create Account 1 from IP address 1
2015-05-14	grooveshark.vc signed up for a Free service plan	Email address 2 used to create Account 2 from IP address 2
2015-05-15	grooveshark.li signed up for a Free service plan	Email address 3 used to create Account 3 from IP address 3

8. Based upon corporate records that I have reviewed, there is no discernible connection between the three accounts other than the use of the Grooveshark name. The three unique accounts used different email addresses and different user names. The accounts were created by one or more customers logging in from three different IP addresses at the time of account creation.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: May 28, 2015


Justin Paine

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ William J. Harrington